DE10-212

Attention of the Executive Director

Dear Ms Howland.

Pursuant to the above referenced 'Notice of Opportunity to Comment', Warner Power intends to present comments.

Warner Power believes energy conservation is an important, indeed vital, part of any rebate program, and consequently such a rebate program should not be limited to PV and SWH only.

We take the view that, assuming the underlying investment is broadly similar, a pure saving of 1 Watt in demand is more beneficial to the economy and the environment than merely transferring that 1 Watt from non-renewable to renewable solar sources.

We also take note that 1 Watt saved continuously 24/365, saves 8.76kWh per year, which is 4 times greater than 1 Watt being saved only when the sun is shining (approx 2,200 hours per year in NH) or 2.2kWh per year

Ideally one would wish:

- firstly to mitigate consumption broadly and effectively to reduce overall energy use, as well as peak demand;
- and secondly to supply the remaining use from renewable sources.

The two are complementary and inseparable, since the present high consumption and demand is very wasteful and would require excessive investment in renewable sources to meet this consumption and demand.

A proper balance can therefore leverage both the private and public investments and maximize the returns, both economically and environmentally.

We respectfully submit that this would be an appropriate matter for the Commission's further consideration. Warner Power would be pleased to provide a written submission and/or attend the public hearing. Your advice on the best way to proceed would be welcomed.

Sincerely,

Peter G. Amos Senior Vice-President

WARNER ®

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